

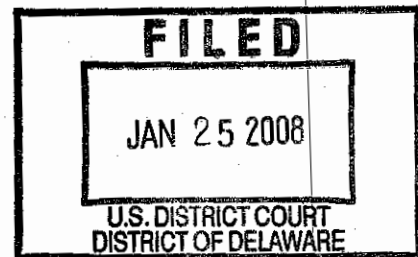
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ADAM HACKETT,
Plaintiff,

v.

C.A. NO. 06-426 KAJ

CORRECTIONAL MEDICAL SERVICE,
WARDEN, THOMAS CARROLL AND
COMMISSIONER, STANLEY TAYLOR,
Defendants,



AFFIDAVIT IN SUPPORT OF PLAINTIFF'S
REPLY TO CORRECTIONAL MEDICAL SERVICE'S
RESPONSE TO PLAINTIFF'S MOTION FOR
APPOINTMENT OF COUNSEL.

I, Adam HACKETT, Plaintiff/Affiant in, the Above
Action Case do hereby swear that the statements, made
herein are true And Correct to the best of My
Knowledge AND belief AND ARE SWORN to
UNDER Penalty of Perjury Pursuant to 28 U.S.C.A.
746 AND 10 DELAWARE CODE 5323.

THE FOLLOWING:

1. Plaintiff's Motion to the COURT AND Plaintiff's Reply to the Defendant C.M.S. CORRECTIONAL MEDICAL SERVICES Response is in good faith And Not to burden or delay the COURT involving this Case in Controversy.
2. Plaintiff, has in good faith Made A fair, And diligent Effort to Contact the LAW OFFICE'S OF:
 1. Liguori, Morris & YiENGst
 2. Albert M. Greto, Esquire AND
 3. BIFFERATO, BIFFERATO, & GENTilotti

See Replies from those whom sent A Reply, Attached to this Affidavit
3. Plaintiff Asserts that in the EVENT that the, Court has Made A Ruling in the Interest of Justice, the Court May Consider Permitting Relief from Such Judgement or Order Pursuant to FRCP 60(b)(1) or 60(b)(6). Plaintiff, has unfortunately been unable to procure Counsel, However, under the Extraordinary Circumstances of this CASE the Court Must Reconsider Entertaining the Appointment of counsel.
4. Plaintiff, states that Ray v. Robinson, 640 F.2d 474, 477-79 (3d Cir 1981) 18 U.S.C. 3006 A Provides no funds for Attorneys fees in civil Actions by Prisoners but District Court has discretion under 28 U.S.C. 1915 to Appoint Counsel in AN in FORMA PAUPERIS Civil Proceeding).

5. Plaintiff, STATES that HE is offering THE NEWS JOURNAL, ARTICLE dated Friday November 18, 2005, to help DEMONSTRATE Why the Need for COUNSEL is so "IMPERATIVE". THE COURT MAY TAKE "JUDICIAL" NOTICE of this Exhibit Pursuant to Fed. Evid. RULE 201 see Exhibit (C)

6. Plaintiff, states that it is belief that he CAN with the Aide of Counsel Sufficiently Establish A Constitutional Claim of NAdequate Medical CARE by Convincing Proof of deliberate indifference to his Serious Medical Needs. That the Standards of deliberate indifference which include both the Objective And Subjective Components Exist in this Case in Controversy. That, the deprivation of care is objectively Serious And the facts gives rise to A Reasonable inference that the individuals Responsible CORRECTIONAL MEDICAL SERVICES, INC. whom WAS Providing Medical CARE know of those Serious Medical needs And intentionally disregarded them. Counsel May Also be of ssistance to me with MEDICAL PAROLE.

7. Plaintiff, STATES, that through Counsel, CORRECTIONAL MEDICAL SERVICES, INC has Not Only Caused deliberate Indifference to my Medical Needs, But, Also Attempts to further handicap my Efforts to obtain legal Representation An Act that t SEEMS the Defendants would welcome under the circumstances of this CASE, However, CMS's, Actions ARE functionally equivalent to denial of ACCESS to the COURT to prevent full And fair disclosure to my injury in fact.

SWORN to on this 21 day of January
2008. Pursuant to 28 U.S.C. A. 1746 And 10
DELAWARE Code 5323. I, ADAM HACKETT, declare
the Aforement STATEMENT to be true And Correct
to the best of My knowledge And belief

Adam Hackett
AFFIANT

MR. ADAM HACKETT # 329697
DELAWARE CORRECTIONAL CENTER
1181 Paddock Road
Building 22 Bower 1
Smyrna, DE 19977